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VIA ECF AND HAND DELIVERY

January 24, 2017

Hon. William H. Pauley
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1920
New York, New York 100007

Re: ***In re: Topical Corticosteroid Antitrust Litigation*, Case No. 16-mc-7000**
***In re: Clobetasol Antitrust Litigation*, Case No. 16-mc-7229**
***In re: Desonide Antitrust Litigation*, Case No. 16-mc-7987**
***In re: Fluocinonide Antitrust Litigation*, Case No. 16-mc-8911**

Dear Judge Pauley:

We represent Defendants Taro Pharmaceutical Industries Ltd. and Taro Pharmaceuticals U.S.A., Inc. (together, "Taro") in the actions referenced above. We write regarding the Court's order in Master Case Order No. 1, ¶ 22, No. 16-mc-7000, Dec. 22, 2016, ECF No. 1, that Taro produce subpoenas and related communications with the U.S. Department of Justice ("DOJ"). For the reasons stated below, we respectfully request that the time to produce those documents be extended to March 31, 2017, and that the government be permitted to intervene in these cases with respect to the order to produce subpoenas and related communications. Plaintiffs consent to this request.

In Master Case Order No. 1, the Court ordered Taro to produce subpoenas and communications with DOJ by January 5, 2017. The Court extended that deadline at Taro's request to January 12, 2017. In a letter dated January 10, 2017, Plaintiffs' Interim Lead Counsel moved for a second extension of the deadline because DOJ had requested additional time to consider whether to intervene in these cases before Taro made the production. The Court granted an extension to January 26, 2017.

DOJ has now informed Taro and Plaintiffs that it intends to intervene in the cases to protect DOJ's ongoing grand-jury investigation and that it believes Taro's production of documents under Master Case Order No. 1 could interfere with DOJ's investigation. DOJ, Taro, and Plaintiffs' Counsel have consulted and agree, subject to the Court's approval, that: (1) the government should be permitted to intervene in these cases with respect to production of the subpoenas and related communications, and (2) Taro's deadline to produce documents pursuant

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to Master Case Order No. 1 should be extended to March 31, 2017. We understand that Your Honor's Chambers suggested in response to an inquiry from DOJ that a communication from the parties in lieu of a formal motion to intervene would be acceptable.

Taro, Plaintiffs, and DOJ therefore respectfully request that the Court: (1) permit the government to intervene in these cases under Federal Rule of Civil Procedure 24 with respect to production of the subpoenas and related communications, and (2) extend the time for Taro to produce documents under Master Case Order No. 1 to March 31, 2017.

We thank the Court for its time and attention to this matter.

Respectfully,

s/ David N. Cinotti

David N. Cinotti

cc: All counsel of record (by ECF)
Jason D. Jones, USDOJ (by email)